

Exhibit 3

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Bill No. 420396/03SLW

Cost Center: 8413 - Other LLB Workout

Page 1

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

January 27, 2012

Resp. Atty.: PJA

Bill No. 420396/03SLW

Total for Services

----- \$540.00

Summary of Disbursements and Other Charges

Date	Description	Total
Total Disbursements and Other Charges		

Total of This Bill

\$----- \$540.00

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Bill No. 422037/03SLW

Cost Center: 8413 - Other LLB Workout

Page 1

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

February 14, 2012

Resp. Atty.: PJA

Bill No. 422037/03SLW

01/20/12	Drafted portions of complaint against O'Brien; drafted cover e-mail to client	BLM	7.40
01/23/12	Attention to draft complaint and forward same to J. Bowen	JFC	0.50
01/25/12	Attention to emails from B. Mack; discussion with B. Mack regarding status with draft	JFC	0.30
01/26/12	Draft email to B. Mack regarding national bank status for Sovereign Bank (need to amend complaint)	JFC	0.10
01/31/12	Telephone call from J. Bowen regarding edits to complaint; attention to file regarding same	JFC	0.50

Total Hours for Matter 00051

20.80

Total Time for Matter 00051

\$5,525.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partners			
			0
Coffey, James F.	5.7	360.00	\$2,052.00
Associates			
Mack, Benjamin L.	15.10	230.00	3,473.00
Total Time for Matter 00051			\$5,525.00
Total of This Bill			\$5,525.00

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT

FEDERAL TAX ID: 04-2106505

Page 2

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

March 13, 2012

Resp. Atty.: PJA

Bill No. 423828/03SLW

Sovereign Bank New England
75 State Street
Boston, MA 02109

Attention: John P. Bowen, Vice President

FOR PROFESSIONAL SERVICES rendered and unbilled through February 29, 2012 in connection with
the following:

Matter Name: Global Broadcasting of Southern New England LLC
Matter No.: 00051

Billing Contact: Paul J. Ayoub, Esq. (Telephone no.: 617-439-2270)**Cost Center: 8413 - Other LLB Workout**

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
02/01/12	Attention to monthly update for bank	JFC	0.30
02/06/12	Emails from J. Bowen; discussion with B. Mack regarding completion of draft complaint; email to J. Bowen; update monthly report for Bank; review demand letter sent by Bank	JFC	0.80
02/16/12	Attention to voice mail from J. Bowen regarding details for Complaint	JFC	0.10
02/23/12	Attention to Complaint	JFC	0.40
02/24/12	Follow up with B. Mack regarding complaint against K. O'Brien	JFC	0.30
02/27/12	Discussion with B. Mack regarding draft complaint; email regarding same	JFC	0.10
02/27/12	Research re: complaint against O'Brien; revised complaint	BLM	2.50
02/28/12	Telephone call to B. Mack regarding Complaint	JFC	0.10
02/28/12	Research re: complaint against O'Brien; revised complaint	BLM	2.80

Total Hours for Matter 00051

7.4

Total Time for Matter 00051

\$1,975.00

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

March 13, 2012

Resp. Atty.: PJA

Bill No. 423828/03SLW

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partners			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Coffey, James F.	2.10	360.00	756.00
Associates			
Mack, Benjamin L.	5.30	230.00	1,219.00
Total Time for Matter 00051			[REDACTED] \$1,975.00
Total for Services			[REDACTED] \$1,975.00
Total of This Bill			---\$ [REDACTED] \$1,975.00
[REDACTED]			[REDACTED]
[REDACTED]			[REDACTED]

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Bill No. 426287/03SLW

Attention: John P. Bowen, Vice President

Cost Center: 8413 - Other LLB Workout

PAYMENT DUE UPON RECEIPT
BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT
FEDERAL TAX ID: 04-2106505

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

April 10, 2012

Resp. Atty.: PJA

Bill No. 426287/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
03/20/12	Drafted and revised demand letter	BLM	2.10
03/21/12	Revised demand letter	BLM	0.80
03/26/12	Attention to diary regarding deadline for response to demand letter	JFC	0.20
03/27/12	Overview email from L. Stern with attached correspondence regarding K. O'Brien	JFC	0.20
03/28/12	Attention to email regarding retention of litigation counsel by K. O'Brien; note to file regarding same with contact information	JFC	0.30
03/29/12	Reviewed letter from counsel to O'Brien	BLM	0.40

Total Hours for Matter 00051

7.40

Total Time for Matter 00051

\$2,235.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partners			
Coffey, James F.	4.1	\$360.00	\$1,476.00
Associates			
Mack, Benjamin L.	3.30	230.00	759.00

Total Time for Matter 00051

\$2,235.00

Total for Services

\$2,235.00

Summary of Disbursements and Other Charges

<u>Date</u>	<u>Description</u>	<u>Total</u>
03/02/12	Filing Fee	350.00
03/02/12	Federal Express	20.42

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT

FEDERAL TAX ID: 04-2106505

Page 2

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

April 10, 2012

Resp. Atty.: PJA

Bill No. 426287/03SLW

Total Disbursements and Other Charges

\$370.42

Total of This Bill

\$2,605.42

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

May 8, 2012

Resp. Atty.: PJA

Bill No. 428285/03SLW

Sovereign Bank New England
75 State Street
Boston, MA 02109

Attention: John P. Bowen, Vice President

FOR PROFESSIONAL SERVICES rendered and unbilled through April 30, 2012 in connection with the following:

Matter Name: Global Broadcasting of Southern New England LLC
Matter No.: 00051

Billing Contact: Paul J. Ayoub, Esq. (Telephone no.: 617-439-2270)

Cost Center: 8413 - Other LLB Workout

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
04/02/12	Attention to Amended Complaint	JFC	0.50
04/02/12	Research in support of Amended Complaint; drafted amended complaint	BLM	3.70
04/03/12	Attention to amended complaint	JFC	0.50
04/03/12	Attention to issues re: service of summons	BLM	1.10
04/04/12	Attention to issues involving service of Complaint upon K. O'Brien; discussion regarding strategy in service of process; review emails from process server in California; review cases on service of process	JFC	2.50
04/04/12	Attention to issues re: service of summons; calls with process server re: same	BLM	2.80
04/05/12	Review documents	JFC	0.30
04/05/12	Attention to issues re: service of summons; calls with process server re: same	BLM	1.50
04/10/12	Telephone call from and telephone call to Bill Norman, counsel to K. O'Brien regarding settlement discussion; review letter and law of California regarding enforcement of personal guarantees	JFC	1.20
04/11/12	Telephone calls from B. Norman regarding conference call tomorrow; emails regarding conference call and call with client	JFC	1.00

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

May 8, 2012

Resp. Atty.: PJA

Bill No. 428285/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
04/11/12	Reviewed letter response from counsel to O'Brien; legal research re: same; coordinated call with O'Brien's counsel	BLM	3.30
04/12/12	Review letter from B. Norman; make notes for call with B. Norman; call with J. Bowen at the bank; conference call with B. Norman; follow up call with J. Bowen; draft email to J. Bowen with information concerning K. O'Brien	JFC	2.00
04/12/12	Call with counsel for O'Brien; prep for call; discussion with J. Bowen re: same	BLM	1.60
04/30/12	Review diary regarding deadline to answer complaint; review file regarding materials to be sought via discovery	JFC	2.00

Total Hours for Matter 00051

24.00

Total Time for Matter 00051

\$6,820.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partners			
Coffey, James F.	10.00	360.00	3,600.00
Associates			
Mack, Benjamin L.	14.00	230.00	3,220.00

Total Time for Matter 00051

\$6,820.00

Total for Services

\$6,820.00

Summary of Disbursements and Other Charges

<u>Date</u>	<u>Description</u>	<u>Total</u>
02/10/12	Filing Fee	293.00

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT

FEDERAL TAX ID: 04-2106505

Page 2

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Bill No. 428285/03SLW

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PAYMENT DUE UPON RECEIPT
BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT
FEDERAL TAX ID: 04-2106505
Page 3

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

June 28, 2012

Resp. Atty.: PJA

Bill No. 431696/03SLW

Sovereign Bank New England
75 State Street
Boston, MA 02109

Attention: John P. Bowen, Vice President

FOR PROFESSIONAL SERVICES rendered and unbilled through May 31, 2012 in connection with the following:

Matter Name: Global Broadcasting of Southern New England LLC
Matter No.: 00051

Billing Contact: Paul J. Ayoub, Esq. (Telephone no.: 617-439-2270)

Cost Center: 8413 - Other LLB Workout

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
05/01/12	Attention to discovery to be conducted; review notes from and telephone call from Bill Morman; attention to monthly update; discussion with B. Mack; review email from B. Norman regarding retention of local counsel	JFC	1.80
05/02/12	Attention to email to B. Norman; evaluate extension of time to answer complaint; email from B. Norman; attention to file; follow up regarding amending complaint	JFC	1.00
05/03/12	Review email from J. Bowen regarding status; follow up regarding same	JFC	0.20
05/07/12	Attention to monthly update; email to C. MacDonald	JFC	0.20
05/08/12	Discussion with J. Bowen regarding update	JFC	0.30
05/10/12	Review file regarding guarantee and review K. O'Brien financial statement; attention to items to be sought in discovery	JFC	1.20
██████	████████████████████	██████	██████
05/14/12	Check diary regarding deadline for service of responsive pleading	JFC	0.20
05/15/12	Attention to email from M. Russo; check deadlines for responsive pleadings and extension dates and draft reply email to M. Russo requesting updated financials from K. O'Brien; follow up with B. Mack	JFC	0.80
05/18/12	Attention to docket	JFC	0.20

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Bill No. 431696/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
05/21/12	Attention to pleadings filed via PACER; review Notices of Appearance; review answer and counterclaims asserted against the bank; discussion regarding counterclaims; review guaranty; telephone call to B. Mack regarding counterclaim; review letter from California counsel	JFC	3.40
05/21/12	Reviewed motion to dismiss filed by O'Brien; legal research re: same	BLM	3.20
05/22/12	Attention to Notice of Rule 16 conference to be held on June 20th in Judge Lisi's chambers; attention to diary and file regarding same	JFC	0.50
05/22/12	Call with client re: motion to dismiss filed by O'Brien; legal research re: same	BLM	4.50
05/24/12	Attention to response to counterclaims; review law regarding same; attention to local district court rules	JFC	1.20
05/24/12	Attention to pleading responsive to Motion to Dismiss; legal research re: same	BLM	4.80
05/25/12	Review counterclaims asserted in answer; develop responses to same	JFC	1.20
05/31/12	Attention to Notice of Rule 16 conference; review rules regarding same	JFC	0.50

---\$7,447.00

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

June 28, 2012

Resp. Atty.: PJA

Bill No. 431696/03SLW

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partners			
██████████	████	████	████
Coffey, James F.	12.70	360.00	4,572.00
Associates			
Mack, Benjamin L.	12.50	230.00	2,875.00
Total Time for Matter 00051			██████████ \$7,447.00
Total for Services			██████████ \$7,447.00

Summary of Disbursements and Other Charges

<u>Date</u>	<u>Description</u>	<u>Total</u>
04/04/12	Service of Process - Pacific Coast Legal Services	312.50
05/04/12	Transcripts of Testimony - Rosemary Patalano	275.00
05/08/12	Westlaw	2.11
05/09/12	Westlaw	2.11
05/14/12	Westlaw	36.82
Total Disbursements and Other Charges		\$628.54

Total of This Bill ██████████ \$8,075.54

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

July 27, 2012

Resp. Atty.: PJA

Bill No. 432694/03SLW

Sovereign Bank New England
75 State Street
Boston, MA 02109

Attention: John P. Bowen, Vice President

FOR PROFESSIONAL SERVICES rendered and unbilled through June 30, 2012 in connection with the following:

Matter Name: Global Broadcasting of Southern New England LLC
Matter No.: 00051

Billing Contact: Paul J. Ayoub, Esq. (Telephone no.: 617-439-2270)

Cost Center: 8413 - Other LLB Workout

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
06/02/12	Review email regarding status with case and filing of responsive pleading	JFC	0.10
06/04/12	Discussion regarding motion to dismiss under 12(b)(6)	JFC	0.20
06/04/12	Research in support of Motion to Dismiss; drafted motion and supporting memorandum	BLM	3.10
06/05/12	Attention to issues for motion to dismiss	JFC	0.50
06/05/12	Research in support of Motion to Dismiss; drafted motion and supporting memorandum	BLM	5.80
06/06/12	Telephone call to J. Bowen; attention to Rule 16 scheduling conference issues; discussion regarding Motion to Dismiss and motion to attach assets; telephone call to M. Russo regarding 16(b) conference; review FRCP Rule 16; review conference notice; attention to Rule 26 regarding discovery and disclosure obligations	JFC	1.80
06/06/12	Research in support of Motion to Dismiss; drafted motion and supporting memorandum	BLM	5.30
06/07/12	Discussion regarding presence of Rhode Island counsel at Rule 16(b) conference on 6/20/12; emails regarding same; attention to Motion to Dismiss; prepare monthly update	JFC	1.10
06/07/12	Research in support of Motion to Dismiss; drafted motion and supporting memorandum	BLM	4.30

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Bill No. 432694/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
06/08/12	Review email from M. Russo regarding Rule 16(b) conference; attention to strategy regarding conference; discussion with B. Mack regarding conference and motion to attach assets; obtain transcript necessary for motion to dismiss	JFC	1.00
06/08/12	Research in support of Motion to Dismiss; drafted motion and supporting memorandum	BLM	5.40
06/10/12	Research in support of Motion to Dismiss; drafted motion and supporting memorandum	BLM	8.80
06/11/12	Review and revise Motion to Dismiss; telephone call to J. Bowen requesting permission to file Motion to Dismiss; discussion regarding filing motion by midnight tonight; emails to and from Mark Russo regarding conference call tomorrow; revise second draft of memo of points and authorities; telephone call to B. Mack regarding filing same	JFC	3.20
06/11/12	Research in support of Motion to Dismiss; drafted motion and supporting memorandum; filed motion and memorandum	BLM	7.50
06/12/12	Prepare for and attend conference call mandated by local Rule 16 with M. Russo; attention to Rule 16(b)	JFC	1.00
06/13/12	Review and revise local Rule 16(b) statement of claim; discussion regarding same	JFC	0.80
06/15/12	Attention to file regarding schedule for call back from M. Russo; discussion regarding same; attention to pro hac vice pleadings	JFC	0.80
06/15/12	Research re: pro hac vice process; prepared pro hac vice papers	BLM	2.10
06/18/12	Attention to pro hac vice papers; execute same; prepare for hearing tomorrow	JFC	1.80
06/19/12	Prepare for hearing; review of pleadings	JFC	2.00

PAYMENT DUE UPON RECEIPT
BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT
FEDERAL TAX ID: 04-2106505

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

July 27, 2012

Resp. Atty.: PJA

Bill No. 432694/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
06/20/12	Attend hearing in Providence, Rhode Island regarding Rule 16(b) conference; telephone call to J. Bowen regarding results of hearing; emails regarding results of conference; discussion with M. Russo	JFC	1.00
06/28/12	Attention to email from J. Bowen regarding status; telephone call to J. Bowen regarding same; discussion with B. Mack	JFC	0.30
06/30/12	Email regarding notices served in case	JFC	0.10

Total Hours for Matter 00051

58.00

Total Time for Matter 00051

\$15,381.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partners			
Coffey, James F.	15.70	\$360.00	\$5,652.00
Associates			
Mack, Benjamin L.	42.30	230.00	9,729.00

Total Time for Matter 00051

\$15,381.00

Total for Services

\$15,381.00

Summary of Disbursements and Other Charges

<u>Date</u>	<u>Description</u>	<u>Total</u>
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PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT

FEDERAL TAX ID: 04-2106505

Page 3

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

July 27, 2012

Bill No. 432694/03SLW

\$1,926.67

----- \$17,307.67

114

114

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

August 22, 2012

Resp. Atty.: PJA

Bill No. 436073/03SLW

Sovereign Bank New England
75 State Street
Boston, MA 02109

Attention: John P. Bowen, Vice President

FOR PROFESSIONAL SERVICES rendered and unbilled through July 31, 2012 in connection with the following:

Matter Name: Global Broadcasting of Southern New England LLC
Matter No.: 00051

Billing Contact: Paul J. Ayoub, Esq. (Telephone no.: 617-439-2270)

Cost Center: 8413 - Other LLB Workout

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
07/02/12	Attention to file regarding deadline for filing responsive pleading to Motion to Dismiss; email regarding monthly status update	JFC	0.50
07/03/12	Draft monthly update for the bank	JFC	0.50
07/12/12	Attention to diary deadline regarding time to file responsive pleading to the bank's Motion to Dismiss; conference with B. Mack; review defendant's objection to Motion to Dismiss	JFC	0.80
07/12/12	Reviewed objections to motion to dismiss; legal research re: same	BLM	2.20
07/17/12	Review response to the bank's motion to dismiss	JFC	0.80
07/18/12	Legal research in support of reply brief in further support of motion to dismiss	BLM	3.50
07/19/12	Review and revise Reply Brief; discussion with B. Mack regarding same; instructions regarding compliance with local Rhode Island District Court rules; attention to rules; review O'Brien's response to the bank's motion to dismiss	JFC	2.80
07/19/12	Drafted and revised reply brief in further support of Motion to Dismiss	BLM	5.80
07/20/12	Attention to updated court docket regarding filing of Reply Brief	JFC	0.20

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

August 22, 2012

Resp. Atty.: PJA

Bill No. 436073/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
07/23/12	Review of referral of Motion to Dismiss to Magistrate Lincoln Almand for settlement conference	JFC	0.20
07/26/12	Emails from and to J. Bowen with update regarding settlement; attention to discovery to be served on O'Brien including rules for taking deposition of O'Brien; review docket regarding discovery order and discussion regarding same	JFC	1.60
07/27/12	Emails to J. Bowen regarding deposition of K. O'Brien; discussion with B. Mack regarding same; attention to notice of mediation conference; telephone call to J. Bowen; review Rule 45(b)(2) and 26(c)(1)(B) of the Federal Rules of Civil Procedure regarding place for deposition	JFC	1.20
07/30/12	Emails to M. McGowan regarding venue for deposition; emails with instructions to B. Mack regarding deposition of K. O'Brien	JFC	0.50

Total Hours for Matter 00051

20.60

Total Time for Matter 00051

\$5,921.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Partners			
Coffey, James F.	9.10	\$360.00	\$3,276.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Associates			
Mack, Benjamin L.	11.50	230.00	2,645.00

Total Time for Matter 00051

\$5,921.00

Total for Services

\$5,921.00

Summary of Disbursements and Other Charges

PAYMENT DUE UPON RECEIPT
BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT
FEDERAL TAX ID: 04-2106505

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

August 22, 2012

Resp. Atty.: PJA

Bill No. 436073/03SLW

<u>Date</u>	<u>Description</u>	<u>Total</u>
06/21/12	Mileage, Tolls, Parking	8.00
06/30/12	Computer Aided Research	27.60
07/15/12	Westlaw	21.11
07/18/12	Westlaw	32.25
07/19/12	Westlaw	51.09
07/20/12	Westlaw	127.57
07/24/12	Westlaw	79.23
07/25/12	Westlaw	91.93
07/27/12	Westlaw	21.53
07/31/12	Lexis	12.20
07/31/12	Computer Aided Research	6.80
Total Disbursements and Other Charges		<u>\$479.31</u>

Total of This Bill

----- \$6,400.31

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

September 28, 2012

Resp. Atty.: PJA

Bill No. 439261/03SLW

Sovereign Bank New England
75 State Street
Boston, MA 02109

Attention: John P. Bowen, Vice President

FOR PROFESSIONAL SERVICES rendered and unbilled through August 31, 2012 in connection with the following:

Matter Name: Global Broadcasting of Southern New England LLC
Matter No.: 00051

Billing Contact: Paul J. Ayoub, Esq. (Telephone no.: 617-439-2270)

Cost Center: 8413 - Other LLB Workout

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
08/01/12	Attention to O'Brien deposition	JFC	0.50
08/03/12	Attention to Notice of Taking Deposition	JFC	0.20
08/06/12	Review Defendants' Rule 26 disclosures and document requests; review pleadings	JDP	1.30
08/06/12	Attention to O'Brien document request and Rule 26 disclosures	JFC	1.20
08/07/12	Draft Rule 26(a) initial disclosures and requests for production; review pleadings and receivership filings	JDP	4.70
08/07/12	Attention to discovery issues	JFC	0.70
08/08/12	Draft interrogatories and requests for admission	JDP	1.30
██████	██	██████	██████
08/08/12	Attention to counterclaim issues; emails regarding same	JFC	0.20
██████	██	██████	██████
08/09/12	Finalize drafts of initial discovery; review J. Coffey comments	JDP	0.50
08/09/12	Attention to counterclaim; review discovery propounded to the bank; discussion with B. Mack; email to J. Bowen; review and revise proposed discovery to K. O'Brien; attention to email from A. Weiner	JFC	3.50
08/10/12	Revisions to initial discovery	JDP	0.30

Nutter, McClennen & Fish, LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2604
(617) 439-2000

Client No.: 0104614

September 28, 2012

Resp. Atty.: PJA

Bill No. 439261/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
08/10/12	Attention to discovery issues	JFC	0.30
08/13/12	Revisions to initial discovery	JDP	0.20
08/16/12	Attention to discovery issues	JFC	0.50
08/20/12	Email from J. Bowen regarding status; follow up regarding same; email from S. Morris with instructions to proceed	JFC	0.60
08/21/12	Attention to discovery issues regarding requests for production of documents, requests for admissions, notice of taking deposition	JFC	1.20
08/23/12	Revise discovery and initial disclosures	JDP	0.90
08/23/12	Review edits to discovery requests	JFC	0.80
08/24/12	Memo regarding upcoming deadlines and hearing dates under the scheduling order	JDP	0.30
08/27/12	Final edits to document requests, interrogatories and requests for admission and prepare service; continue to work on Rule 26(a) disclosures; draft letter requesting excusal from settlement conference	JDP	3.30
08/27/12	Attention to emails regarding upcoming hearing and discovery schedule; review list of possible individuals with knowledge of claims and defenses; attention to loan file; retrieve names for initial disclosures; review memorandum in support of motion to dismiss and cases cited therein	JFC	2.50
08/28/12	Continuing work on Rule 26(a) disclosures; attention to service; draft responses to defendants' requests for production; prepare materials for status conference; review briefs and summary document	JDP	5.50
08/28/12	Work on discovery issues; review and revise disclosures to be made per rule 26(a); attention to settlement conference order; email from J. Bowen regarding discovery and telephone conference tomorrow; review emails from the clerk, J. Noel; telephone call from J. Bowen; review file for individuals with knowledge of claims and defenses; prepare for status conference	JFC	3.50

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT

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Page 2

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Client No.: 0104614

September 28, 2012

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Bill No. 439261/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
08/29/12	Attend status conference with Judge Almond; conference with J. Bowen; research and analyze possibility of preliminary injunction; conference with C. Fonda and memo to C. Fonda regarding electronic discovery	JDP	6.10
08/29/12	Prepare for status conference with Judge Lincoln Almand; attend status conference; telephone call to J. Bowen; attention to emails regarding discovery; telephone call from and telephone call to A. Weiner regarding electronic discovery; discussion regarding asset search and electronic discovery; review scheduling order	JFC	4.20
08/30/12	Research privilege issues; investigate O'Brien land transfers; review receivership pleadings;	JDP	2.30
08/30/12	Emails from J. Bowen; attention to asset search issues; telephone call from [REDACTED] regarding asset search; attention to agreement with [REDACTED]; review revised order from the court altering the discovery schedule; evaluate issues regarding maintaining the attorney client privilege with [REDACTED]	JFC	2.80
08/31/12	Conference with C. Fonda regarding status of document collection	JDP	0.30
08/31/12	Attention to discovery issues; execute engagement letter for [REDACTED]; review items for response to electronic discovery request; draft of discovery response; review emails from A. Wiener	JFC	2.80

Total Hours for Matter 00051

52.50

Total Time for Matter 00051

\$15,390.00

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT

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Page 3

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Client No.: 0104614

September 28, 2012

Resp. Atty.: PJA

Bill No. 439261/03SLW

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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Partners

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Coffey, James F.	25.50	360.00	9,180.00

Associates

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Persky, Jonathan D.	27.00	230.00	6,210.00

Total Time for Matter 00051

-----\$15,390.00

Total for Services

-----\$15,390.00

Summary of Disbursements and Other Charges

<u>Date</u>	<u>Description</u>	<u>Total</u>
08/02/12	Westlaw	2.25
08/29/12	Filing Fee	50.00
08/29/12	Postage	0.45
08/29/12	Westlaw	55.58
08/30/12	Westlaw	21.95
Total Disbursements and Other Charges		\$130.23

Total of This Bill

-----\$15,520.23

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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155 Seaport Boulevard
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Client No.: 0104614

October 28, 2012

Resp. Atty.: PJA

Bill No. 442624/03SLW

Sovereign Bank New England
75 State Street
Boston, MA 02109

Attention: John P. Bowen, Vice President

FOR PROFESSIONAL SERVICES rendered and unbilled through September 30, 2012 in connection with the following:

Matter Name: Global Broadcasting of Southern New England LLC
Matter No.: 00051

Billing Contact: Paul J. Ayoub, Esq. (Telephone no.: 617-439-2270)

Cost Center: 8413 - Other LLB Workout

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
09/03/12	Review list of discovery items to be addressed	JFC	0.70
09/04/12	Draft settlement conference statement	JDP	1.80
09/04/12	Research regarding e-discovery obligations; review settlement conference statement	JFC	0.50
09/05/12	Prepare and serve settlement conference statement	JDP	0.30
09/05/12	Prepare for meeting with J. Bowen to review discovery items; review notes regarding discovery from call with A. Wiener; email to J. Bowen regarding meeting to discuss discovery issues; attention to file; review Defendant's Confidential Settlement Conference Statement; emails to J. Persky	JFC	2.90
09/06/12	Meet with J. Bowen; follow up; review documents in J. Bowen file; revise responses to request for production; review O'Brien personal financial statements	JDP	7.40

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October 28, 2012

Resp. Atty.: PJA

Bill No. 442624/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
09/06/12	Draft monthly update for bank; meet with J. Bowen regarding review of discovery requests propounded by O'Brien; attention to Rule 26; review electronic discovery rules regarding production of emails between counsel and receiver; review of loan file	JFC	3.90
09/07/12	Attention to response to document request; conference with J. Bardsley regarding access to electronic documents; voicemail for J. Dorsey regarding extension on document production	JDP	1.50
09/07/12	Attention to emails; telephone call regarding discovery items; review documents produced by bank including customer portfolio review report, risk rating change sheets, internal bank memoranda and watched asset reports for Global Broadcasting; discussion with J. Persky regarding discovery strategy; review email from [REDACTED]; attention to Quarterly Loss Assessment Form	JFC	3.20
09/10/12	Voicemail for J. Dorsey regarding extension of time to respond to discovery	JDP	0.10
09/10/12	Attention to discovery and prepare for mediation with Judge Almand; review settlement conference statement items sent by M. Russo and J. Dorsey	JFC	3.50
09/11/12	Conference with J. Bardsley regarding obtaining data for document review and litigation hold; emails with [REDACTED] regarding investigation	JDP	0.70
09/11/12	Attention to emails regarding [REDACTED] investigation; follow up regarding same; discussion regarding preliminary injunction; emails from [REDACTED] and J. Persky regarding scope of investigation; review updated credit report on K. O'Brien; email to J. Bowen regarding meeting tomorrow in Providence; prepare for mediation; review pleadings and cases cited therein	JFC	5.20
09/12/12	Prepare for and attend settlement conference; meetings J. Bowen; research personal financial statements and emails with [REDACTED]; draft motion for preliminary injunction	JDP	4.40
09/12/12	Prepare for mediation; review file documents and pleadings; attend mediation session with Judge Almand; attention to email regarding information needed for preliminary injunction enjoining the transfer of assets; review emails from [REDACTED]; discussion with M. Russo	JFC	6.20
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

PAYMENT DUE UPON RECEIPT

BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT

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Page 2

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Client No.: 0104614

October 28, 2012

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Bill No. 442624/03SLW

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
09/20/12	Evaluate results of [REDACTED] report; telephone call to California counsel; consider strategy regarding pursuit of fraudulent conveyance action in California; attention to issues regarding trustee process defendants	JFC	1.70
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
09/21/12	Conference with J. Bardsley regarding document production issues; emails with Russo regarding response to document requests; continue drafting amended complaint; research additional causes of action; review documents for production	JDP	5.40
09/21/12	Research constructive trust and trustee process issues	RHG	3.40
09/21/12	Discussion regarding strategy for pursuing preliminary injunction, trustee process and fraudulent conveyance claims; telephone call to California counsel; emails regarding trustee process of accounts; attention to file documents and pleadings; telephone call and email regarding review of recommendations for pursuing recovery v. O'Brien; review emails from M. Russo; telephone call to J. Bowen; email from A. Wiener; email regarding trustee process actions	JFC	4.50
09/22/12	Review documents for production; continue drafting amended complaint; continue drafting motion to amend; work on memo in support of motion for preliminary injunction	JDP	3.90
09/23/12	Continue drafting memorandum in support of preliminary injunction; revisions to amended complaint	JDP	5.00
09/23/12	Research constructive trust and trustee process issues; draft Motion for Trustee Process Attachment	RHG	4.50
09/24/12	Attention to document production; telephone with [REDACTED] regarding investigation; research regarding fraudulent transfers; finalize responses to document requests; continue researching and drafting memorandum in support of preliminary injunction	JDP	6.00
09/24/12	Attention to Amended Complaint; draft and edit Motion for Trustee Process Attachment and Memorandum	RHG	5.30
09/24/12	Review email from A. Wiener; attention to Watched Asset Reports; discussion whether any bank policy document with respect to forbearance might be discoverable; attention to other discovery issues; conference call regarding production of documents; attention to emails regarding call with California counsel	JFC	2.20

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Page 4

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<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
09/25/12	Telephone with Matt McGowan; telephone with Steve Bovarnick; telephone with J. Bowen; finalize and serve responses to document requests; finalize and serve document production; attention to email discovery	JDP	4.80
09/25/12	Attention to Amended Complaint; draft and edit Motion for Trustee Process Attachment and Memorandum	RHG	6.40
09/25/12	Evaluate issues and develop litigation strategy; telephone call to M. McGowan regarding status with case and documents sought by K. O'Brien; telephone call to S. Bovarnick, proposed California counsel; telephone call to J. Bowen regarding response to document request and litigation issues; review and revise verified amended complaint; memorandum of law in support thereof; review case law cited therein; attention to emails	JFC	4.40
09/26/12	Continue revisions to amended complaint; continue revisions to memorandum in support of preliminary injunction; communicate with vendor on electronic discovery; emails with J. Bowen regarding facts; review draft of motion for trustee process	JDP	3.10
09/26/12	Draft and edit Motion for Trustee Process Attachment and Memorandum	RHG	4.30
09/26/12	Review of memorandum of law; attention to Verified Amended Complaint; evaluate legal issues concerning parallel action in California; research regarding same; review balance owed to Sovereign as alleged in complaint; develop strategy regarding trustee process attachments	JFC	3.30
09/27/12	Review discovery responses; email [REDACTED]; continue drafting court filings	JDP	5.10
09/27/12	Draft and edit Motion for Trustee Process Attachment and Memorandum; conduct research on trustee process and writ of attachment	RHG	1.70
09/27/12	Review and revise pleadings; attention to issues regarding trustee process; review K. O'Brien's responses to requests for admissions and first set of interrogatories; evaluate strategy for preliminary injunction	JFC	4.80
09/28/12	Review documents produced by O'Brien; review discovery responses; edits to amended complaint; edits to memorandum in support of preliminary injunction; edits to motion to compel; telephone conferences with S. Bovarnick and J. Bowen; email to Russo regarding discovery deficiencies	JDP	5.40

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Page 5

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<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
09/28/12	Research for and draft Motion to Compel	RHG	6.60
09/28/12	Evaluate issues relating to bank accounts maintained by K. O'Brien; review case law and rules regarding obtainment/standards for temporary restraining orders and preliminary injunction; coordinate filing of Motion for preliminary injunctions; evaluate strategy with local counsel; review discovery response documents produced by K. O'Brien; attention to expert witness disclosure deadline and evaluate whether bank will need experts; email from M. Russo; email from S. Morris regarding Bank's lack of a forbearance policy	JFC	5.40
09/29/12	Revisions to amended complaint, memorandum in support of preliminary injunction, and motion to amend; emails with S. Bovarnick and review cases; review documents for production; prepare exhibits	JDP	5.10
09/29/12	Research for and draft Motion to Compel; edit and cite check Motion to Amend the Complaint and Motion for Preliminary Injunction	RHG	2.00
09/29/12	Review and revise memo in support of motion to amend complaint and memo in support of motion for preliminary injunction	JFC	0.80
09/30/12	Legal research regarding personal jurisdiction and naming of spouse under CUFTA; revisions to motion to amend complaint and research concerning supplementation; continue document review	JDP	7.20

Total Hours for Matter 00051

181.4

Total Time for Matter 00051

\$49,964.00

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Page 6

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October 28, 2012

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Bill No. 442624/03SLW

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
-------------------	--------------	-------------	---------------

Partners

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Coffey, James F.	63.40	360.00	22,824.00

Associates

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Gallup, Rebecca H.	34.20	230.00	7,866.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Persky, Jonathan D.	83.80	230.00	19,274.00

Total Time for Matter 00051

-----\$49,964.00

Total for Services

-----\$49,964.00

Summary of Disbursements and Other Charges

<u>Date</u>	<u>Description</u>	<u>Total</u>
08/29/12	Federal Express	49.23
08/31/12	Computer Aided Research	4.20
08/31/12	Computer Aided Research	90.80
09/04/12	Westlaw	4.35
09/06/12	Messenger Delivery	18.25
09/13/12	Messenger Delivery	15.75
09/13/12	Westlaw	46.68
09/14/12	Westlaw	18.07
09/18/12	Federal Express	17.04
09/19/12	Taxi-Passenger	11.00
09/19/12	Westlaw	239.73
09/20/12	Westlaw	30.15
09/21/12	Westlaw	96.03
09/23/12	Westlaw	196.10
09/24/12	Westlaw	111.51
09/24/12	Telephone	0.12

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Page 7

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Bill No. 442624/03SLW

\$1,818.19

10/1/2014